



Linda Jacobson
RCRA Project Manager
US EPA Region VIII
8ENF-T
1595 Wynkoop Street
Denver, Colorado 80202-1129

June 18, 2007

SENT BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Interim Measures Work Plan Addendum for Soil Characterization, Excavation, and
Temporary Capping as Part of 2007 Demolition Plan - Asarco East Helena Plant

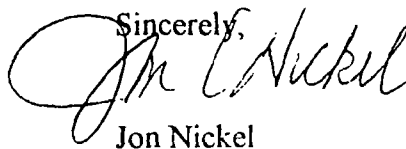
Dear Ms. Jacobson,

On June 6, 2007, Asarco received EPA's May 25, 2007 letter that requested submission of an Interim Measures Work Plan Addendum for Soil Characterization, Excavation, and Temporary Capping as Part of 2007 Demolition Plan. The May 25, 2007 letter specified that certain elements be contained within the work plan.

On May 30, 2007, Asarco submitted the 2007 Interim Measures Work Plan Addendum, Blast Furnace Flue and Monier Flue Cleaning, Demolition, and Soil Sampling Work Plan. Although specific to the blast furnace flue and Monier flue, this work plan addresses the major components requested in EPA's May 25, 2007 letter including 1) the number of samples that will be collected and the analytical parameters that will be tested to characterize the soils in unpaved areas, 2) the standard operating procedures that will be employed for surface and subsurface soil sample collection, 3) the excavation concentration removal limits (soil cleanup levels) within unpaved areas, 4) the manner in which metal concentration from remaining soils will be documented, 5) the temporary capping of demolition areas using fumed slag that has been contoured to achieve the desired drainage.

We believe that the Work Plan components listed above largely address EPA's request for a separate Work Plan Addendum. Accordingly, in the spirit of efficiency, Asarco proposes that EPA review the recent Work Plan submission and identify what, if any, additional requirements should be added as an Addendum. This approach seems logical to us, as the procedures provided for the blast furnace flue and Monier flue sampling program would seem to be equally applicable for a program that addresses other demolition areas. Also, we believe that this ensures that Asarco and EPA will not be duplicating efforts.

Please contact me if you have any questions.

Sincerely,

Jon Nickel

Cc: Chuck Figur
Sharon Kercher